

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**IN RE:**

**Case No. 08-35653-KRH**

**CIRCUIT CITY STORES, INC., et al.**

**Chapter 11 (Jointly administered)**

**Debtors,**

**AMENDED VERIFIED STATEMENT OF MULTIPLE CREDITOR  
REPRESENTATION PURSUANT TO BANKRUPTCY RULE 2019**

I, Paul K. Campsen, Esq., on behalf of Kaufman & Canoles, a professional corporation (“K&C”), file this verified statement, in accordance with Bankruptcy Rule 2019, with respect to its legal representation of: (i) Lea Company, a Virginia general partnership, the assignee from Newport News Shopping Center, LLC; (ii) Crossways Financial Associates, LLC; (iii) Vance Baldwin, Inc.; (iv) Tritronics, Inc.; (v) Ramco West Oaks I, LLC, Ramco JW, LLC; (vi) RLV Village Plaza, LP; (vii) RLV Vista Plaza, LP; (viii) Rebs Muskegon, LLC, Pelkar Muskegon, LLC, and Faram Muskegon, LLC, as tenants in common; and (ix) MHW Warner Robins, LLC (collectively, the “Landlords”) and state as follows:

1. The names and addresses of the creditors co-represented by K&C in this matter are as follows:

Lea Company, a Virginia general partnership,  
the assignee from Newport News  
Shopping Center, LLC  
P. O. Box 2008  
Virginia Beach, VA 23450

Crossways Financial Associates, LLC  
c/o Harbor Group International, LLC  
999 Waterside Drive, Suite 2300  
Norfolk, VA 23510

Paul K. Campsen, Esq. (VSB No. 18133)  
Kaufman & Canoles, a professional corporation  
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Post Office Box 3037  
Norfolk, VA 23514  
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*Counsel for Lea Company, et als.*

Ramco West Oaks I, LLC  
c/o Ramco – Gershenson  
31500 Northwestern Hwy., Suite 300  
Farmington Hills, MI 48334

Ramco JW, LLC  
c/o Ramco – Gershenson  
31500 Northwestern Hwy., Suite 300  
Farmington Hills, MI 48334

RLV Village Plaza, LP  
c/o Ramco - Gershenson  
31500 Northwestern Hwy., Suite 300  
Farmington Hills, MI 48334

RLV Vista Plaza, LP  
c/o Ramco - Gershenson  
31500 Northwestern Hwy., Suite 300  
Farmington Hills, MI 48334

Rebs Muskegon, LLC, Pelkar Muskegon, LLC,  
& Faram Muskegon, LLC, as Tenants in Common  
c/o Broder & Sachse Real Estate Services, Inc.  
260 E. Brown St., Suite 200  
Birmingham, MI 48009

Vance Baldwin, Inc.  
c/o Ronald Gellert, Esq.  
Ecirt Seamans Cherin & Mellott, LLC  
300 Delaware Avenue, Suite 1210  
Wilmington, DE 19801

Tritronics, Inc.  
c/o Ronald Gellert, Esq.  
Ecirt Seamans Cherin & Mellott, LLC  
300 Delaware Avenue, Suite 1210  
Wilmington, DE 19801

MHW Warner Robins, LLC  
c/o Corporate Property Group, Inc.  
7332 Office Park Place, Suite 101  
Melbourne, FL 32940

2. The Landlords currently hold or will hold unsecured pre-petition claims, unsecured lease rejection damage claims and/or administrative priority claims for unpaid post-petition rent and other charges under their respective leases with the Debtors. The full amount of each of the Landlords' claims is undetermined at this time.

3. The Landlords are billed monthly at K&C's normal hourly rates for its partners, of counsel, associates, and legal assistants for time spent and costs incurred in providing legal services.

4. The Landlords have all retained K&C to represent them with respect to their interests in connection with the above captioned case. All parties are aware of, and have consented to, K&C's joint representation of other clients in this case.

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

**Kaufman & Canoles, a  
professional corporation**

By: /s/ Paul K. Campsen  
Of Counsel



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*Counsel for Lea Company, et als.*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Amended Verified Statement of Multiple Representation Pursuant to Bankruptcy Rule 2019 was sent first-class, postage prepaid U.S. Mail, on this 15<sup>th</sup> day of December, 2008, to those parties listed on **Schedule 1** and to all creditors and parties-in-interest who are included in the United States Bankruptcy Court's ECF e-mail notification system.

/s/ Paul K. Campsen



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**SCHEDULE 1**

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12/10/08